parts with anything of value, such as evidence of the debt. *Moyer v. Heidelbach,* 123 N. Y. 332. And the generally accepted rule is that the purchaser holds the note free from equities, although he gives up nothing for it. *American File Co. v. Garrett,* 110 U. S. 288; *Bridgeport City Bank v. Welch,* 29 Conn. 475. In the present case the note was delivered in New York and hence governed by the law of that State. The majority of the court seemed to mistake the fact that, on this point, the New York law is contrary to the general rule.

BILLS AND NOTES—FOREIGN JUDGMENTS—CONCLUSIVENESS—LIMITATIONS. —BRAND V. BRAND, 76 S. W. 868 (KY.).—In an action on a note in New York judgment was given for the defendant on the grounds that suit was barred by the statute of limitations. *Held,* that such a judgment affects only the remedy to be had in that State, and the plea of the New York judgment is not good in an action brought in another State, where a different statute of limitations prevails.

It is well established that where an injured party has a right to either of two remedies, the one he chooses is not barred because the other, if he had brought it, might have been. *Lamb v. Clark,* 5 Pick. 193; *Missouri Sav. Bank Co. v. Rice,* 84 Fed. 131. This is strong evidence that, in absence of stipulations to the contrary, statutes of limitations relate to the remedy only, and not to the cause of action. And it is very generally held that such statutes are a part of the *lex fori. Bauerman v. Blunt,* 147 U. S. 647; *M'Elmoyle v. Cohen,* 13 Pet. 312; *Story, Conflict of Laws* (8th ed.), sec. 576. Hence a judgment based upon such a statute is not conclusive in other jurisdictions. This rule is applicable to the statutes of foreign countries, as well as to those of the several States. *Bulger v. Roche,* 11 Pick. 36. The same doctrine is well established in England. *Dicey, Conflict of Laws,* 422. *Harris v. Quine,* (1869), L. R. 4 Q. B. 653, is on all fours with the decision under discussion.

CITIES—STREET SPRINKLING—PUBLIC PURPOSE—TAXATION.—MAYDWELL V. CITY OF LOUISVILLE, 76 S. W. 1091 (KY.).—*Held,* that the sprinkling of city streets is such a public purpose that an ordinance, levying a tax for the expense involved, is constitutional.

The statutes on street sprinkling, that have come before the courts, have been those providing for assessments on abutting property as for local improvements. These have been held to be constitutional on the ground that "the sprinkling, besides being of general public good, was of special private benefit." *Sears v. Boston,* 173 Mass. 71; *State v. Reis,* 38 Minn. 371; *Reinkin v. Furhring,* 130 Ind. 382. City ordinances, requiring trolley companies to sprinkle the roadbed between their tracks, have been declared constitutional, as providing for the public health. *State v. R. R. Co.,* 50 La. Ann. 1189; *Chester v. Traction Co.,* 5 Pa. Dist. 609. Several of the cases contain *dicta* on the point of principal case, for example,—"that street sprinkling is a public purpose is unquestioned." *State v. Reis, supra.* It would therefore seem that the ruling of this case is sound.

CONSTITUTIONAL LAW—DUE PROCESS OF LAW—RECEIPTS AS CONCLUSIVE EVIDENCE.—HARRIS V. STEARNS, 97 N. W. 361 (S. D.).—*Held,* that a legislative enactment providing that a tax receipt shall be conclusive evidence that